

STATE OF KANSAS



RECEIVED

OCT 25 1988

RCOM SECTION

DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

October 6, 1988

RECEIVED

OCT 10 1988

BUREAU OF WASTE
MANAGEMENT

Mr. Wayne Ortloff, President
Teledyne Independence
P.O. Box 946
Independence, Kansas 67301

Re: Hazardous Waste Compliance Inspection
EPA Identification Number: KSD981712854

Dear Mr. Ortloff:

On September 23, 1988, a hazardous waste compliance inspection of your facility was conducted by this department to determine your compliance with state and federal regulations concerning hazardous waste.

The inspection revealed your facility generates the following hazardous wastes as defined by 40 CFR, Part 261, Subparts C & D as adopted by Kansas Administrative Regulation (K.A.R.) 28-31-3:

Wastes Generated	EPA Waste Number
1. Waste 1, 1, 1-trichloroethane	F001
2. Waste isopropyl alcohol (isopropanol)	D001
3. Waste corrosive liquid (Turco)	D002
4. Waste petroleum solvent	D001

The inspection also revealed your facility uses an ignitable hydrocarbon mixture as a calibrating fluid. It was indicated at this time, no waste is generated from this operation. In the future, if you do generate waste calibrating fluid, it will be classified as a hazardous waste and will need to be disposed of in a proper manner. Our recommendation would be to have a solvent recovery company pick up this waste for recycling.



R00076514

RCRA Records Center

Mr. Wayne Ortloff, President
October 6, 1988
Page 2

Two additional waste streams, waste Oakite solution and waste water contaminated with petroleum solvent, are also being disposed of as a hazardous waste. The waste profile for the Oakite solution shows it to be nonhazardous; however, this analysis was not performed by a laboratory certified by the department. A waste analysis for the waste water was not available.

In order to properly classify these waste streams, we are directing you to have both wastes analyzed by a KDHE certified laboratory. The analysis should include a pH test, a flash point test, and an analysis of purgable organics. Please continue to manage these wastes as hazardous wastes until they are analyzed. If the wastes are determined to be nonhazardous, you should contact the city and determine if the wastes can be disposed of in their waste water treatment system.

Generator Classification

The quantity of hazardous waste generated occasionally exceeds 1,000 kilograms (approximately 2,200 pounds) per month, and/or the quantity of hazardous waste stored on-site exceeds 1,000 kilograms. Therefore, your facility is considered an EPA generator and is regulated under K.A.R. 28-31-4, excluding K.A.R. 28-31-4(h) and K.A.R. 28-31-4(m).

Deficiencies

The inspection identified the following items not in compliance with state and federal regulations concerning generators of hazardous waste:

1. Your facility has not filed an updated Notification of Hazardous Waste Activity, EPA form 8700-12, as required by K.A.R. 28-31-4(c)(1). Your last notification shows your facility as a Kansas generator, rather than an EPA generation. You should also update Section X to accurately indicate the types of wastes generated at your facility. A tear-out notification form is included in the Hazardous Waste Generator's Handbook. Refer to K.A.R. 28-31-4(c)(1).
2. Your facility did not have placards available for the initial transporter as required by K.A.R. 28-31-4(e)(4).

Mr. Wayne Ortloff, President
October 6, 1988
Page 3

3. One 55-gallon drum storing hazardous waste was not labeled with the words "Hazardous Waste" as required by K.A.R. 28-31-4(g)(3).
4. Hazardous waste stored in the storage area was not arranged so as to allow the unobstructed movement of personnel and equipment in an emergency. Refer to K.A.R. 28-31-4(g)(4).
5. Your facility has not submitted copies of your contingency plan to the local police and fire departments, hospitals, and/or any local emergency response team as required by K.A.R. 28-31-4(g)(4). (Refer to 40 CFR 265.53(b)).
6. Your contingency does not outline the capabilities of the emergency equipment as required by K.A.R. 28-31-4(g)(4). For example, the plan should briefly outline the capabilities of fire extinguishers, wet vacuums, or any chemicals used to neutralize spills. (Refer to 40 CFR 265.52(e)).
7. Your contingency plan does not list the home addresses for the emergency coordinator or the alternate as required by K.A.R. 28-31-4(g)(4). (Refer to 40 CFR 265.52(d)).

Deficiency 3 must be corrected immediately. The other deficiencies must be corrected by November 18, 1988. Please send a letter to the Southeast District Office, P.O. Box 888, Chanute, Kansas 66720, to verify that the above deficiencies have been corrected.

Additional Comments and Requirements

During the inspection, the location of the south property line of the facility could not be determined. Since ignitable hazardous wastes must be stored at least 50 feet from the facility's property line and your hazardous waste is stored on the south portion of the property, you will need to determine the location of the property line. If the waste is stored less than 50 feet, you must either move the waste or request a variance from this provision as provided for in K.A.R. 28-31-13. Questions regarding a variance should be directed to Mr. John Paul Goetz, Chief of Hazardous Waste Section, Bureau of Waste Management, Kansas Department of Health and Environment, Forbes Field, Topeka, Kansas 66620-0001, or you may call him at 913/296-1607. Please let us know the location of the property line.

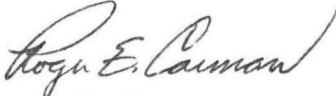
Mr. Wayne Ortloff, President
October 6, 1988
Page 4

Drawings contained in the contingency plan should show the location of the hazardous waste storage area, property lines and entrances and exits of the plant's grounds. An example outline of a contingency plan is enclosed for your use.

The inspection identified one 55-gallon drum outside the hazardous waste storage building and four 55-gallon drums located outside of the southwest corner of the main building that contain unknown materials. In a telephone conversation on October 5, 1988, Mr. Lloyd Meek, of your company, stated that the four drums mentioned above contained waste calibrating fluid (D001). He stated that these drums have been labeled and dated and will be moved to the hazardous waste storage area. Please identify the contents of the remaining drum mentioned above. If it contains hazardous waste, it must be properly labeled and dated.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning the inspection, please call me at 316/431-2390, or contact the Kansas Department of Health and Environment, Bureau of Waste Management in Topeka, phone 913/296-1500.

Sincerely yours,



Roger E. Carman
Inspections & Enforcement Section
Bureau of Waste Management
Southeast District - Chanute

REC:da

Encl.

pc: Tom Gross, BWM ✓
John Paul Goetz, BWM
SED, Chanute